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December 18, 2022

VIA ECF

The Honorable Loretta A. Preska
United States District Judge Southern District of New York
500 Pearl Street
New York, New York 10007-0116

Re: *United States v. Concepcion*
21 CR 479 (LAP)

Dear Judge Preska,

I represent Jesus Concepcion in the above-captioned proceeding. I am writing to request that his pending trial date, currently scheduled for 2/6/22, be adjourned, albeit relatively briefly. Specifically, I request 6-8 weeks in order adequately prepare for trial. I make this request because there is a significant amount of discovery in this matter and my client is currently incarcerated (which significantly limits my access to him as well as his access to discovery). Further, in New York State Supreme Court, I have had a client withdraw his guilty plea on an attempted murder case from 2019. As such, the Court wants to expedite the case for trial. We are currently scheduled for January 3, 2022. The Government consents to this one-time adjournment request. I would request a mid-March or early April date. Thank you.

The trial date is adjourned. The parties shall appear for trial on April 17, 2023, in Courtroom 12A. The Court finds that the time between February 6, 2023, and April 17, 2023, is excluded from calculation under the Speedy Trial Act. Because of the Defendant's stated need for more time to prepare for trial, the exclusion is in the interest of justice.

Sincerely,

_____/s/_____
Raoul Zaltzberg, Esq.

SO ORDERED.



12/22/22

C.c. AUSA Camile Fletcher and Alexandra Messiter by Electronic Mail